

EXHIBIT K

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ANNA GROVER,
PLAINTIFF

v.

SHECHTMAN HALPERIN SAVAGE, LLP,
DEFENDANT.

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C.A. NO. 16-041-ML-PAS

JOINT MOTION TO EXTEND THE DATES SET FORTH
IN THE COURT'S DECEMBER 12, 2016 SCHEDULING ORDER

Plaintiff Anna Grover and Defendant Shechtman Halperin Savage, LLP jointly move to amend the scheduling order by extending by ninety (90) additional days the deadlines set forth therein as follows:

- (1) From 2/27/2017 to 5/29/2017 for Factual Discovery;
- (2) From 3/27/2017 to 6/26/2017 for Plaintiff's Expert Disclosures;
- (3) From 4/25/2017 to 7/24/2017 for Defendant's Expert Disclosures;
- (4) From 6/30/2017 to 9/28/2017 for Expert Discovery;
- (5) From 7/14/2017 to 10/12/2017 for Dispositive Motions; and
- (6) From 7/28/2017 for 10/26/2017 Pretrial Memoranda.

As grounds for this motion and in support thereof, the parties aver as follows. The parties are attempting to resolve certain discovery issues and are working diligently to move this case forward. Accordingly, the parties believe that the proposed extension of the previously ordered deadlines will allow the parties to complete focused discovery and, if necessary, present streamlined issues to the Court for adjudication. The parties do not anticipate further extension requests at this time.

The parties are available to attend a Rule 16 conference with the court on short notice if necessary before this Court determines this motion.

Plaintiff,
ANNA GROVER
By Her Attorney,

/s/ Alicia M. Connor
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Defendant
SHECHTMAN HALPERIN SAVAGE, LLP
By Its Attorney,

/s/ Ali Khorsand
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Dated: February 15, 2017

CERTIFICATE OF SERVICE

I hereby certify this document was filed through the ECF system with the Clerk of the U.S. District Court for the District of Rhode Island and, therefore, all counsel-of-record has received notice electronically.

/s/ Alicia M. Connor